

It is abundantly clear from the results of the recent NTIA study that the FCC's rulemaking proposal is premature at best, and it would be irresponsible of the FCC to go forward in enacting BPL rules before the NTIA Phase 2 study is completed later this year.

Salient points of the recently completed NTIA study indicated: 1) That the methods currently used to measure noise levels and interference potential are inadequate; 2) That noise levels must be measured from BPL-energized power lines as well as the 'device' coupling the signal to the power lines; 3) That interference to weak-to-medium strength signals is likely out to more than 1/4 mile from a BPL noise source; and 4) That more study is needed in several important areas, including skywave propagation of BPL signals.

I would urge the FCC to consult with its comparable agencies in the countries of Japan and Austria where BPL has been placed "on hold" due to the inherent interference problems it creates.

Additionally, and finally, I would urge strict FCC enforcement of compliance to the existing Part 15 rules as they pertain to interference to existing licensed services.